

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

VIRGINIA L. GIUFFRE,

Plaintiff / Counterclaim Defendant,

v.

ALAN DERSHOWITZ,

Defendant / Counterclaim Plaintiff.

Case No. 19-cv-03377-LAP
REDACTED VERSION

**DECLARATION OF HALEY N.
PROCTOR**

HALEY N. PROCTOR hereby declares pursuant to 28 U.S.C. § 1746 as follows:

1. I am counsel to Plaintiff/Counterclaim Defendant Virginia Giuffre (“Plaintiff”) in this action. I make this declaration in support of Plaintiff’s Response in Opposition to Defendant/Counterclaim Plaintiff Alan Dershowitz’s (“Defendant”) Motion To Compel the Production of Certain Attorney-Client Communications on the Basis of Wavier, or, in the Alternative, Request for *Zolin* Examination.

2. Attached hereto as **Exhibit 1** and submitted under seal is a true and correct copy of

[REDACTED].

3. Attached hereto as **Exhibit 2** is a true and correct copy of a compilation of email communications produced by Defendant.

4. Attached hereto as **Exhibit 3** is a true and correct copy of a September 10, 2018, letter from Gayle Marie Brown Driver, Assistant Disciplinary Counsel of the District of Columbia Office of Disciplinary Counsel, to Defendant concerning dismissal of Defendant’s disciplinary complaint against Sigrid S. McCawley.

5. Attached hereto as **Exhibit 4** is a true and correct copy of a December 31, 2018 letter from Jerold R. Ruderman, Chairperson of the State of New York Grievance Committee for the Ninth Judicial District, to David Boies concerning dismissal of Defendant's complaint against Boies.

6. Attached hereto as **Exhibit 5** is a true and correct copy of a June 17, 2019 letter from Joi L. Pearsall, Bar Counsel to the Florida Bar, to Defendant concerning dismissal of disciplinary proceedings against Sigrid S. McCawley.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: May 20, 2021

Respectfully submitted,

/s/ Haley N. Proctor
Haley N. Proctor